

MEMO ENDORSED

**LAW OFFICE OF AMY JANE AGNEW, P.C.**

Honorable Kenneth M. Karas  
United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601-4150

December 27, 2022

**VIA ECF and EMAIL (karasnysdchambers@nysd.uscourts.gov)**

**Re: Ceara v. Deacon, 13-cv-6023**

Dear Judge Karas:

This office serves as *pro bono* counsel to Plaintiff Rafael Ceara in the above-referenced matter. As the Court is aware, this office appeared *pro bono* in Mr. Ceara's other pending case in the WDNY with hopes of settling both claims. While the case in front of Judge Payson is trial ready, there were a few evidentiary items we needed, so we requested to reopen discovery for very limited purposes. Judge Payson allowed the limited discovery. As soon as that is completed, we will see if we can settle both cases on equitable terms.

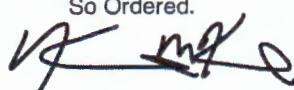
With the consent of Defendant's counsel, this office requests leave to file a letter motion to the Court under seal requesting a stay to accommodate Mr. Ceara's current health status. This office does not believe the details should be shared on the public docket and we are hopeful the Court will grant the application. Pursuant to the Court's Individual Rule IX (B)(ii) we are emailing a digital copy of the letter to be sealed to chambers. The letter motion requesting a stay will not implicate the *Lugosch* holding as the contents include only information of a personal nature to Mr. Ceara and not any facts relevant to this case or arguably judicial documents.

Granted.

So Ordered.

Very truly yours,

*/s/ Amy Jane Agnew*



12/27/22

Amy Jane Agnew, Esq.

w/enclosure (VIA EMAIL ONLY)

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